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Counsel for Alexander Christy

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

CELSIUS NETWORK LLC, *et al.*,

Debtors.

CELSIUS NETWORK LIMITED,

Plaintiff,

v.

EQUITIES FIRST HOLDINGS, LLC, *et al.*,

Defendants.

Chapter 11

Case No. 22-10964 (MG)

(Jointly Administered)

Civil Case No. 23-cv-10036-GHW

Adversary Proceeding No. 23-01167 (MG)

NOTICE OF MOTION OF DEFENDANTS' MOTION TO STAY PENDING APPEAL

PLEASE TAKE NOTICE that Defendants Equities First Holdings, LLC and Alexander Christy (together, the “Defendants”), by its undersigned counsel, respectfully move the United States District Court for the Southern District of New York, on a date and time to be determined by the Court, for an order under rule 8007 of the Federal Rules of Bankruptcy Procedure (the “Motion”) for a stay of the above-captioned adversary proceeding pending appeal for the reasons set forth in the accompanying Memorandum of Law in Support of Defendants’ Motion to Stay Pending Appeal.

Defendants moved for such relief in the Bankruptcy Court for the Southern District of New York, which the Bankruptcy Court denied. Defendants have made no previous request to this Court for the relief requested by this Motion.

WHEREFORE, Defendants respectfully request that the Court enter an order granting the relief requested herein, and such other and further relief as the Court deems just and appropriate.

Dated: November 14, 2023

/s/ Gregory M. Juell

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